

## ZASTROW EXHIBIT 3

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# DEPOSITION OF WARREN GIBSON

Taken on March 17, 2009

LEMOND CYCLING, INC. -VS- TREK BICYCLE  
CORPORATION

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COMPLIMENTARY CONDENSED

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1 A. And California is a bit higher, 7.75, yes.

2 Q. Great. Okay.

3 So you received this price sheet from -- from  
4 Ms. Huber?

5 A. Yes.

6 Q. Okay. So you and Ms. Hague were aware of the  
7 prices that Mr. LeMond was paying for the bikes?

8 A. Yes.

9 Q. Let's turn to a different topic. In  
10 connection with your work with Mr. LeMond you worked  
11 with a number of different companies that Mr. LeMond  
12 had contracts with and sponsorships and endorsements,  
13 right?

14 A. Yes.

15 Q. How did Trek compare to the other companies  
16 Mr. LeMond worked with in terms of how it marketed  
17 Mr. LeMond?

18 MS. RAHNE: Object to the form.

19 THE WITNESS: Well, Mr. LeMond, up until the  
20 relationship with Trek, never had a bicycle company or  
21 really any other company that really marketed him or  
22 provided him the income that Trek provided him for the  
23 sales of LeMond bicycles. Trek had the best marketing,  
24 the best sales force, and the best distribution of  
25 bicycles that Greg had ever had up to that fact because

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1 there hasn't been anybody else. They were the best.

2 Q. BY MR. WEBER: Okay. Now one of the things  
3 that Trek asked for in its contract with Mr. LeMond was  
4 to make personal appearances in support of his brand.  
5 Are you aware of that?

6 A. Yes.

7 Q. And was Mr. LeMond enthusiastic about making  
8 personal experiences or would you describe it some  
9 other way?

10 MS. RAHNE: Object to the form.

11 THE WITNESS: No, Mr. LeMond didn't like to  
12 do personal appearances in any manner.

13 Q. BY MR. WEBER: And what did he say to you  
14 about that?

15 A. He said, I'm a celebrity and I've proven  
16 myself through my athletic performances and people are  
17 buying it -- buying products that I am endorsing and  
18 representing because of my past history.

19 Q. Did Mr. LeMond ever ask you to lie and say he  
20 was sick and couldn't go to an appearance when in fact  
21 he wasn't sick?

22 A. He may have at times. I really can't  
23 recollect exactly, but -- that that was exactly -- that  
24 exactly occurred.

25 Q. We've been going just short of an hour. Why